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*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

SELINA KEENE, MELODY FOUNTILA, MARK ) Case No.: 4: 22-cv-01587-JSW  
 MCCLURE, )

Plaintiffs,

) **DECLARATION OF SELINA KEENE**  
 ) **IN SUPPORT OF MOTION FOR**  
 ) **PRELIMINARY INJUNCTION**

v.

CITY AND COUNTY OF SAN FRANCISCO;  
 LONDON BREED, Mayor of San Francisco in her  
 official capacity; CAROL ISEN Human Resources  
 Director, City and County of San Francisco, in her  
 official capacity; DOES 1-100,

) Date: July 82022  
 ) Time: 9:00 AM  
 ) Courtroom: 5

Defendants.

**DECLARATION OF SELINA R. KEENE**

1  
2 1. I, Selina R. Keene, have personal knowledge of the facts in this declaration, and if called  
3 to testify about them, I would and could do so competently.

4 2. I was always interested in helping people, especially those in need and under served or  
5 under represented. From 1998 to 2004 I worked for the Ella Hill Hutch community center as a  
6 construction apprenticeship coordinator. I conducted weekly introductions to construction  
7 workshops in order to help place candidates into the various construction related union  
8 apprenticeship programs. I also worked with the county redevelopment agency to ensure that  
9 hiring was accomplished on an equal opportunity basis. I monitored the work sites to ensure that  
10 contractors were in compliance with hiring requirements.

11 3. I have been employed by the City and County of San Francisco since August 2005.

12 4. I first worked as an eligibility worker for the family and children's foster care program.  
13 My duties included certifying and providing eligible foster parents and foster care providers with  
14 monetary and medical benefits to support foster children; whether those children were temporarily  
15 placed or long term placed in homes and facilities.

16 5. In 2007 I began working as a 9704 Employment & Training Specialist III with the  
17 human service agency of San Francisco, workforce development division. My duties included  
18 assisting clients to obtain employment and training them in techniques to secure job opportunities,  
19 which included job search and retention education. My administrative functions included, but were  
20 not limited to, creation of resumes, cover letters, thank you letters, and employment aid materials  
21 for clients. Those items were utilized to help clients obtain work in the field of their choice and  
22 experience. They also included creating case comments and updates utilizing launchpad software  
23 and communicating and reporting client status with other support staff. I always considered my  
24 work to be a career, not just a job.

25 6. Due to the COVID-19 outbreak, the human service agency directed staff to shelter in  
26 place. On April 7, 2020, while on furlough, I was instructed to pick up my work laptop and  
27  
28

1 cellular phone from the technology department and to begin working from home. I continued to  
2 provide employment services to my workforce development clients from home.

3 7. I was first notified of the City of San Francisco's vaccine requirement on June 23, 2021.  
4 The city sent an updated notice on July 8, 2021, requiring employees to report their vaccine status  
5 by July 29, 2021, and to be vaccinated 10 weeks after any vaccine was given final approval by the  
6 FDA. On August 23, 2021, the city sent out another update for a return to work and vaccine  
7 deadline. The initial vaccination deadline was September 15, 2021, later updated to November 1,  
8 2021.

9 8. The currently available COVID-19 vaccines were derived from aborted fetal stem cells.  
10 I will not take a vaccine derived from murdered children, because I am a Christian. I believe in the  
11 sanctity of life. On September 17, 2021, I completed a religious accommodation request to the  
12 vaccine mandate. I also responded to many questions asked by the city regarding the sincerity of  
13 my beliefs.

14 9. On October 12, 2021, I submitted that religious accommodation request to the city and  
15 received a confirmation of receipt the same day.

16 10. On October 12, 2021, a Lily Tang from the office of civil rights responded to my  
17 accommodation request. She asked me to respond to 14 additional questions. On October 17, I  
18 responded to those questions.

19 11. On October 20, 2021, I received email notification from a Brenden Lim denying my  
20 religious accommodation request. There was additional back and forth with the city; however, my  
21 religious accommodation request was ultimately denied.

22 12. On January 3, 2022, I started experiencing symptoms related to COVID-19. My  
23 COVID-19 infection was confirmed on 1/6/2022 (home test) and again on 1/17/2022 and  
24 1/25/2022. I have since recovered and now have natural immunity to the disease.

25 13. On February 16, 2022, I submitted a request for a medical accommodation request to  
26 the COVID-19 vaccine mandate.



11 16. On March 24, 2022, I emailed Andrea DeLeon, an HSA Employee Relation Analyst,  
12 requesting a retirement date of March 29, 2022, to avoid a negative impact of termination. I did  
13 not receive a response.

16 18. On March 30, 2022, I contacted the Mayor's assistant to obtain assistance to push her  
17 employer to follow up on my retirement date request to ensure my forced retirement was  
18 conducted in an expedited manner. Ms. DeLeon finally responded after pressure to complete the  
19 retirement process and adjusted the separation report date to March 30, 2022, in order to precede  
20 the negative termination date of April 2, 2022.

22 I declare under penalty of perjury under the laws of the State of California that the above is  
23 true and correct.

Selina Keene

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